I am responding to ET Docket No. 03-104 comments made by United Power Line Council (UPLC) dated July 7, 2003. I specifically want to address comments taken from Section III-B relative to "Interference," and challenge the UPLC in their assertions that BPL is benign in nature when they matter-of-factly state, "The UPLC is pleased to respond that there has been no interference reported in any of the field trials by its members." I question the methodology of this conclusion and ask if their field trials can be posted on the Internet similar to the recent field trials conducted by the American Radio Relay League (ARRL). The results from the ARRL interference study clearly demonstrate the tremendous capacity of BPL to harm HF communications. They can be viewed on mpg video clips available on the Internet at: http://216.167.96.120/BPL_Trial-web.mpg

ARRL Laboratory Supervisor Ed Hare, W1RFI, conducted this field study in late July 2003. Hare's field trials were truly that, as he traveled some 1,350 miles to visit BPL trial communities in Maryland, Virginia, Pennsylvania and New York to take measurements over significant parts of the HF spectrum. He also took initial readings at low-VHF frequencies. Driving a specially equipped vehicle loaded with radio gear and measurement devices, Hare said he didn't need to look long or track down "a few hot spots" to find BPL interference. "The signals were all over," he said.

"The interference found ranged from moderate to extremely strong," Hare said. The video shows the S meter of an HF transceiver holding steady in excess of S9 as the speaker emits a crackling din, which one observer described as sounding like a Geiger counter. Only the very strongest amateur signals broke through on 20 and 15 meters. Hare noted that the field strengths of the various systems all were within FCC Part 15 limits for power line carrier (PLC) devices.

Again, I would challenge the UPLC to display their field trials and reconcile their characterizations of "no interference" by BPL versus the field trial results attained by Mr. Hare. I respectfully submit that the ARRL has clearly demonstrated that BPL can present quantifiable levels of interference that pose a direct threat to communications within the HF spectrum. As such, public service frequencies, military, amateur and other frequencies serving the interests of local and national security may be placed at risk. Is this something our nation can afford to do at this time merely to provide power companies an opportunity for new revenue? I think the events of last Thursday, August 14 with the "Blackout" and the subsequent revelation of antiquated power transmission infrastructures should be proof positive that the power companies need to be redirecting their resources back toward their core business.

Would the FCC care to review the dramatic increase in the Notice of Violations it has levied recently to power companies around the U.S. who are unresponsive to interference complaints primarily resulting from old hardware problems? Why would we as licensed users of the HF spectrum have reason to suspect that power companies will be responsive to BPL interference complaints when they defer, deflect, and deny interference problems currently? And so how can we be expected to take an organization like UPLC seriously when they claim "no interference" when Mr. Hare's field trials clearly show otherwise?

At this time, I sincerely request the FCC to postpone action on BPL and not be influenced by organizations such as UPLC and their unfounded claims of "no interference." There is plenty of time to review the real consequences of this technology and the harmful affects it poses to HF communications. Must we rush into this technology to promote the financial interests of the power companies at the expense of harming our precious and vital airwaves? I sincerely hope not

and beg the FCC to take a closer look at the possible consequences that will come from BPL interference within the HF spectrum.

Respectfully submitted,
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